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UNITED STATES DISTRICT COURT DISTRICT OF UTAH

SARA PARADA, individually and as parent/guardian acting for and on behalf of D.P., a minor child,

Plaintiff,

v.

DAVID PENNINGTON, M.D., et al.,

Defendants.

JOINT MOTION FOR AMENDED SCHEDULING ORDER

Case No. 2:21-cv-00534-TS-JCB

Judge Ted Stewart Magistrate Judge Jared C. Bennett

Pursuant to FED. R. CIV. P. 16(b)(4), the parties, by and through their counsel, hereby jointly move the Court for the entry of the attached Proposed Second Amended Scheduling Order.

The parties seek to extend the remaining discovery deadlines by approximately 120 days. This extension is necessary because new counsel for plaintiff Sara Parada has appeared and needs time to review the discovery completed to date. Additionally, there are several motions pending that need to be resolved before fact discovery can be completed. And finally, an extension is necessary to accommodate counsel's schedules.

WHEREFORE, for good cause shown, the parties request that the Court enter the attached proposed amended scheduling order in this matter.

Dated this 31st day of October, 2022.

TRINA A. HIGGINS United States Attorney

/s/ Amanda A. Berndt AMANDA A. BERNDT **Assistant United States Attorney**

Agreed to by:

THE BARLOW LAW FIRM, LLC

/s/ Matthew Barlow (signed with permission) **MATTHEW BARLOW**

Counsel for Plaintiffs

CAMPBELL, WILLIAMS, FERENCE & HALL

/s/ Dave Ference (signed with permission) **DAVE FERENCE**

Counsel for Defendants David Pennington, M.D. and Pennington Medical Center PLLC dba Pennington Women's Center

RICHARDS BRANDT MILLER NELSON

/s/ Robert G. Wright (signed with permission)

ROBERT G. WRIGHT

Counsel for Defendants IHC Health Services dba Utah Valley Hospital and IHC Health Services, Inc. dba Intermountain Medical Group

EPPERSON & OWENS P.C.

/s/ Steve Owens (signed with permission)
STEVE OWENS

Counsel for Defendants Sean J. Henderson, D.O., Bradley C. Burton, PA-C, and Granger Medical Clinic, P.C.

G. ERIC NIELSON & ASSOCIATES

/s/ Marianne P. Card (signed with permission)
MARIANNE P. CARD